

permanent. Those individuals who were already in the E-PASS system as of January 20, 1993, and who had no expiration date, were designated as permanent passholders.

#### **4. Comparison of Reconstructed Po-Zy List to Actual Po-Zy List**

The OIC compared the "Po" to "Zy" portion of the reconstructed list to the actual "Po" to "Zy" list received from OPS and identified only 13 names on the reconstructed list that are not on the actual list. Of those thirteen, seven had a first entry date of June 10, 1993, possibly reflecting that their first entry occurred after the actual list was created on that date. Possible reasons that the other six were included on the reconstructed list (but not on the actual list) include changes of office or employer between May 2 and June 10, 1993, E-PASS entries between May 2 and June 10, 1993, or even a name change. Only one person was listed on the actual list, but not the reconstructed list, possibly resulting from being in inactive status on May 2, 1993, having a status date change after June 10, 1993, and changing employers before the end of December 1994. Thus, despite being an inactive WHOP passholder as of June 10, 1993, that person would not have been captured by the reconstruction methodology.

The OIC considered these variations insignificant. The reconstructed list -- excluding the seven individuals with a first entry date of June 10, 1993 -- reflected only seven differences, or less than one percent, from the 804 names on the